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Via Electronic Filing
Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

EX PARTE LETTER
RE: WC Docket No. 06-122

Dear Secretary Dortch:

On July 18, 2012, Sheba Chacko, Senior Counsel and Head, North American Regulation and Global Telecoms Policy, BT, met with Vickie Robinson, Deputy Division Chief, TAPD. BT expressed its concern about a potential requirement that resellers certify on a service-by-service basis the use of wholesale inputs in end-user services, and the potential retroactive effect of such a requirement. BT also expressed concern about the timeline for implementing rules requiring more detailed exemption certificates. BT suggested that an industry-led group should formulate exemption certificate language and/or processes that could function as a safe harbor in meeting any such requirements. BT also urged the Commission to undertake discrete reforms that would improve administration of the contribution mechanism and be achievable in advance of comprehensive USF reform.

Please contact the undersigned if you have any questions.

Sincerely,

Sheba Chacko
Head, North American Regulation and Global Telecoms
Policy, BT

cc: Vickie Robinson